

\* FOR REVIEW AND COMMENT ONLY -

\* Please return comments to Colleen Burgh /BP Environmental Unit

**Deepwater Horizon (MC-252) Incident  
MOBILE LOCATION**

Please write in BLUE ink only

by 5 PM MON.

5/31

Name of Plan:	Deepwater Horizon (MC-252) Incident Waste Management / Disposal Plan, Mobile Sector
Section:	Planning, Environmental
Submitted By:	Environmental Unit, Janet Platt
(Name, Signature & Date)	<i>Janet Platt</i> 5/29/10 8:10pm
Reviewed by Planning Chief/ Deputy:	
(Name, Signature & Date)	

**Approved by:**

RPIC	
(Name, Signature & Date)	
FOSCR	
(Name, Signature & Date)	
SOSC-MS	
(Name, Signature & Date)	
SOSC-AL	
(Name, Signature & Date)	
SOSC-FL	
(Name, Signature & Date)	
IC-DOI	
(Name, Signature & Date)	
IC-EPA	
(Name, Signature & Date)	

**This plan has also been reviewed and agreed by:**

Agency/ Team/ Name:	Alabama – ADEM
(Name, Signature & Date)	
Agency/ Team/ Name:	Florida - FDEP
(Name, Signature & Date)	
Agency/ Team/ Name:	Mississippi - MDEQ
(Name, Signature & Date)	
Agency/ Team/ Name:	
(Name, Signature & Date)	

# **Deepwater Horizon (MC-252) Incident** **MOBILE LOCATION**

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## **Original Plan Submittal & Copy Distribution**

Name of Plan:	Deepwater Horizon (MC-252) Incident Waste Management / Disposal Plan, Mobile Sector
Submitted By:  (ICS Position, Signature & Date)	Environmental Unit, Janet Platt

**Distributing Copies To:**  
(to be completed by person submitting plan and verified by Planning Chief or Deputy)

Section/ Unit	# Copies	Received by (ICS Position, Signature, Date)
<b>Environmental Unit</b>	3	
<b>Coast Guard</b>		
<b>Mississippi</b> 1 Incident Commander 1 MDEQ	2	
<b>Alabama</b> 1 Incident Commander 1 ADEM	2	
<b>Florida</b> 1 incident Commander 1 MDEQ	2	
<b>EPA</b>		

**Revision Record**

Review/Amend Date	Review/Amend By	Signature	Updated Pages
5-28-2010	Colleen Burgh	<i>Colleen Burgh</i>	Complete Revision

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## **SECTION I INCIDENT BACKGROUND AND PLAN SCOPE**

This plan is written at the request of the Incident Commander, the U.S. Coast Guard (USCG) Federal On-Scene Coordinator (FOSC), and the associated State On-Scene Coordinator (SOSC) for Mississippi, Alabama, Georgia, and Florida.

In response to the Deepwater Horizon rig incident originating in the Mississippi Canyon Block 252 (MC 252) of the Gulf of Mexico, oil spill cleanup activities are being performed that will result in waste generation. The anticipated waste generation activities may include: oil skimming, oil collection (e.g., use of absorbents), decontamination of equipment, shore line remediation, and wildlife rehabilitation. Other activities may be performed to support oil spill cleanup activities that will also result in waste generation that may be managed under this WMP, as appropriate.

This Waste Management Plan (WMP) outlines the waste management procedures and expectations to support proper handling, staging, storage, manifesting, transportation, disposal/recycling of the waste generated from the spill cleanup activities in the geographical areas under the responsibility of the Mobile Incident Command Center (ICC). The Responsible Party (BP) for the WMP implementation will abide by all applicable local, state, and federal laws and regulations.

This plan will be amended as necessary to ensure compliance with applicable laws and regulations. Amendments may occur only upon mutual agreement by BP and federal and state agencies that provided approval of the original plan.

## SECTION II REGULATORY AGENCY JURISDICTIONS

The Mobile ICC geographical responsibility includes the states of Mississippi, Alabama, Georgia, and Florida, and the Gulf of Mexico. The regulatory agencies and associated contact information that have jurisdiction within the Mobile ICC geographical responsibility are provided in Table II-a. Every effort will be made to ensure coordination and cooperation with the appropriate federal and state environmental agencies and apprise them of waste management and disposal activities performed as this WMP is implemented. As this WMP is amended to include updated information, potentially including additional management activities, waste staging locations or disposal and recycle facilities, the applicable regulatory contacts will be informed of changes and provided a copy of the revised WMP.

**Table II-A: Regulatory Agency Jurisdictions and Point of Contact (POC)**

Agency POC	Contact Phone	Email
Alabama (ADEM) Phil Davis	Office: 334-271-7755 Mobile: 334-239-6450	<a href="mailto:PDD@adem.state.al.us">PDD@adem.state.al.us</a>
Florida (FDEP) Mary Jean Yon	Office: 850-245-8697 Mobile: 850-519-7859	<a href="mailto:Mary.Jean.Yon@dep.state.fl.us">Mary.Jean.Yon@dep.state.fl.us</a>
Georgia (GAEPD) Mark Smith	Office: 404-463-8509 Mobile: 404-362-2564	<a href="mailto:Mark.Smith@dnr.state.ga.us">Mark.Smith@dnr.state.ga.us</a>
Mississippi (MDEQ) Richard Harrell	Office: 601-961-5343 Mobile: 601-668-0900	<a href="mailto:Richard_Harrell@deq.state.ms.us">Richard_Harrell@deq.state.ms.us</a>
Environmental Protection Agency (EPA) Larry Lamberth	Office: 404-562-8590 Mobile: 404-769-5583	<a href="mailto:Lamberth.larry@epa.gov">Lamberth.larry@epa.gov</a>
United States Coast Guard (USCG)	24-hr: 866-448-5816	

### SECTION III WASTE STREAM IDENTIFICATION

The waste streams that are anticipated to be generated from oil spill cleanup activities are described in Table III-a. Estimated generation volume of each waste type is unknown and will depend on the extent of oil spill impact areas and containment operations. The waste type will be described as outlined in this Section. Classification of the waste streams will be determined based on sampling analysis results. If changes to anticipated waste streams are encountered, WM will be notified and the subject waste stream will be re-characterized, if necessary.

**Table III-A: Potential Waste Streams and Type**

<b>Matrix</b>	<b>Description</b>	<b>Type</b>
Solid	Oil-contaminated material that may include debris, soil, sand, and vegetation collected from the shoreline; PPE; disposal equipment; sorbents; etc. Material will be drained of recoverable oil, as practicable.	Exploration and Production (E&P) and Industrial Waste
	Non-contaminated material that has been recovered from support operations of the cleanup activities, including trash and garbage.	Municipal Waste
	Sharps, syringes, PPE, and other medical-related material generated from operations at wildlife rehabilitation centers.	Medical Waste
	Animal carcasses identified during shoreline cleanup and generated from operations at wildlife rehabilitation centers.	United States Fish and Wildlife Service (USFWS) will be responsible for collecting and disposing of all animal carcasses. Contact the Wildlife Unit (866-557-1401) whenever an animal carcass is encountered. Only trained and licensed contractors are permitted to handle animal carcasses under the direction of the USFWS.
Liquid	Recoverable oil and oily water collected during oil skimming and water cleanup activities.	Recyclable Oil and E&P Waste
	Decontamination water generated from decontamination activities of vessels, equipment, reusable booms, etc.	Recyclable Oil and E&P Waste
	Vessel blackwater; portable toilets	Sanitary Waste



## SECTION IV WASTE MANAGEMENT APPROACH

The locations where spill cleanup activities may occur could span the Gulf Coast within the Mobile ICC's geographic responsibility and the Gulf of Mexico. To that end, the waste streams generated during cleanup activities will be collected and routed to pre-determined staging areas that have been approved by the Mobile ICC and applicable regulatory agencies. The waste will then be segregated, classified, and transported for final disposition to an approved disposal or recycle facility.

The following preferred hierarchy of waste management will be implemented, as applicable, during implementation of this WMP:

- Source Reduction            ← Most Preferred
- Recycling
- Treatment
- Disposal                      ← Least Preferred

Initially, the primary effort will be to collect, contain and remove contaminated materials as quickly as possible. As a result, volume and logistics may not allow for all potential management options (e.g., reuse/recycling) to be considered. However, certain materials collected and/or generated as a result of the cleanup activity may have recovery or recycling value. Recovery, reuse or recycling of contaminated and non-contaminated materials will be evaluated and implemented as applicable and practical.

The protocols and waste management operations plans for proper waste handling and recovery, staging, tracking, transporting, and final disposition are outlined below. More detailed waste handling and profiling procedures, approved staging and disposal locations, and other waste-stream specific information is provided in Appendix A.

Waste Management Services (WM) has been selected as the primary coordinator for the waste management activities as described in this plan. In addition, several support and oversight responsibilities for the waste management activities have been delegated to other contractors. The various roles of each of the contractors involved in implementing this Waste Management Plan (WMP) are summarized below:

*Waste Management (WM):*

Day: 251-583-0804

Day: 251-583-0801

Night: 251-583-0791 (after 7pm)

- Providing labor, materials, and equipment to contain and transport the waste;
- Segregating, labeling, and staging wastes;
- Obtaining profiles at approved disposal facilities, and
- Obtaining data and determining waste classifications.

*Environmental Resources Management (ERM):*

Day/night: 251-445-8912



- Completing waste transportation manifests or bills of lading;
- Signing waste manifests, under BP authorization and designated signature authority; and
- Completing waste tracking documents, including type and volume of waste generated and disposed

*Center for Toxicology and Environmental Health (CTEH)*

Day/night: 317-473-0688

- Sampling waste to support characterization and classification.

To arrange for appropriate sample transportation and delivery, contact the single point of contact at 251-583-0804 or 251-583-0801 (day), or 251-583-0791 (after 7pm)..

#### Section IV.A. Handling

In general, solid material generated from oil spill cleanup activities will be handled as follows (more detailed description provided in Appendix A):

- Clean roll-off bins will be stored at designated staging locations. The bins will be lined and transported to the selected area where cleanup activities are occurring as needed.
- Waste will be collected and segregated in the appropriate designated containers that are labeled by BP operations personnel as "oil-contaminated" and "non-contaminated." Once filled, the roll-off bins will be covered during transport back to the staging areas.
- Upon receipt of the material at the staging areas, the waste will be identified as material for disposal or material for recycling. The classification will be based on process knowledge or analytical results from waste sampling.
- Containers will be designated with regard to waste type either by labeling or by location on site.
- Once the waste is classified and the container is determined to be full, a manifest or bill of lading (Appendix G) and relevant paperwork will be prepared and reviewed for completeness. The manifest or bill of lading will be signed by an authorized BP agent (see Appendix H for Waste Manifest Signature Delegation Authority).
- Once approved by the designated WM Coordinator, the container will be covered and released for transport to a designated, approved waste disposal or recycling facility (see list of approved facilities in Appendix A).
- Only contracted BP cleanup firms will be allowed to bring waste to the staging areas. If others attempt to deposit non-spill related waste at the staging areas they will be immediately turned away by security personnel.

Liquid wastes will be handled in a similar fashion except that some liquids will be manifested directly from the collection point to the disposal facility, bypassing the WM Staging Area. In cases where liquids need to be manifested directly to the disposal facility from a location other than a Staging Area or decontamination site, an ERM representative will meet the transporter at the collection point and execute a manifest there. More detail is provided in Appendix B (Waste Management Operations Plan – Liquids).

#### Section IV.B. Staging

Strategic staging areas have been identified to support the cleanup operations associated with this incident. The areas are divided by function of the site which includes equipment staging sites and decontamination stations. A third classification of staging site is beach locations, but these are not listed since their locations will be determined as needed. Also, BP reserves the right to add additional staging areas required for future capacity, as necessary. The agencies listed in Table II-A will be notified as sites are added. A list of the staging locations is provided in Appendix D.

Each staging area will be equipped with an adequate supply of DOT-approved containers to support forecast cleanup activities. Spill Control and Countermeasures Plans will be developed for any sites subject to 40 CFR 112.1.

Each staging area will be supported by at least one of the following personnel:

- Security personnel
- BP personnel (or designated equivalent)
- WM Waste Coordinator

#### Section IV.C. Tracking

A data management system will be used to track waste characterization documentation, profiles, waste manifests, and bill of ladings, the following information will also be obtained and tracked for all wastes managed at, and transported from the staging, decontamination and other facilities (see Appendices E and G for waste tracking and ICS-209 forms).

#### Section IV.D. Transportation

WM has developed a Transportation Plan that mandates that vehicles are operated in a manner that prevents leakage or spillage of waste. A copy of the Transportation Plan is provided in Appendix F.

#### Section IV.E. Final Disposition

Only licensed disposal or recycle facilities listed in Appendix C will be used to manage waste streams. Special arrangements and the required approvals will be obtained for county or municipal disposal facilities (as identified by local and state officials) prior to use, as required.

### **SECTION V DECONTAMINATION**

Onshore decontamination sites will be used to decontaminate personnel, equipment, booms, and other resources, as needed. A Decontamination Plan ("Decontamination Plan – Boom, Vehicle, Equipment and Personnel – Mississippi Canyon 252 Oil Release") has been approved and will be used to decontaminate equipment as necessary. In addition WM drivers will conduct a visual inspection of empty roll-offs, bins or other equipment being transported from the Staging Areas to pick-up locations to assure they are free of oil. If necessary, water collected in roll-offs, bins, and other containers located at the Staging Area will be removed by vacuum truck prior to transportation to pick-up locations. The labeling, profiling, and transporting requirements outlined within this Plan will be applied when managing the oily water and decontamination site waste streams.



## **SECTION VI HEALTH AND SAFETY**

Health and safety for Waste Management will be handled under WM's health and safety company program and WM's project specific Health and Safety Plan.

## **SECTION VII QUALITY ASSURANCE**

Waste management oversight at staging area operations will be performed from WM's Command Center. Routine call-ins will occur at each Staging Area to determine waste/recovery volumes, general flow of material, and any other issues that may arise from the operations of managing these Areas as it relates to waste.

WM will perform routine and unscheduled inspections to ensure containers are covered when not in use, secondary containment is being used (where appropriate), and that liners are being used. Additionally, a third-party oversight person (the ERM representative) is stationed at each staging area to help ensure the Staging Areas are managed properly.

## **SECTION VIII COMMUNITY RELATIONS**

This plan provides direction for staging area personnel in the event of interactions with members of the public or stakeholder groups during decontamination activities. For typical engagement with stakeholders the following guidance is provided:

### **Internal Mission**

- Primary concern is the health and safety of the community, workers, and environment.

### **Stakeholder Engagement**

- Request the nature of the stakeholders business
- Gauge the nature of the stakeholder
- Be polite and courteous
- Ask for their name and contact number
- Provide the stakeholder a laminated "Public Outreach Information Card". A supply of the cards will be provided to personnel at the waste staging facilities. Information provided on the card is provided below.

**Environmental/Community Hotline** – to report oil on the beach or shoreline or other environmental or community impacts - 866-448-5816

**Wildlife Hotline** – to report and access care for impacted, i.e., oiled wildlife - 866-557-1401

**Volunteers** – to request volunteer information - 866-448-5816

**Joint Information** – for media and government inquiries - 985-902-5231/985-902-5240

**Services** – to register as consultant, contractor, vendor, or submit information on alternative response technology, services, products, etc - 281-366-5511

**Vessels of Opportunity** – to report and register boats available to assist with response – 281-366-5511

**Claims Information – 800-440-0858**

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## **Appendix A**

### **Waste Management Operations Plan – Solids**

This Operations Plan will establish Best Management Practices (BMP) guidelines for the staging and routing sites that will ensure proper handling and disposal of waste.

#### **1. Preparation of bins: labeling, lining (for oil-contaminated waste), documentation**

- a. Each container:
  - i. will be identified with a clearly visible, unique numeric or alphanumeric code
  - ii. will be lined prior to placing any contaminated material into it, to aid in the prevention of spills
- b. Containers will be designated with regard to waste type either by labeling or by location on site

#### **2. Prevention of continued contamination: protection from storm water runoff**

- a. The following best management practice will be implemented at each staging and routing site:
  - i. All open top containers will be encased with plastic liners.
  - ii. During transportation all loaded containers will be tarped utilizing the truck's mechanical tarping system, roll tarp or box cover.
  - iii. Containers will be routinely inspected at the staging areas to assure proper containment of waste.
  - iv. Any damaged containers will be identified and removed from service for required repair prior to returning to service.
  - v. In the event leakage does occur, the following will take place:
    - 1. Source of leak will be determined and corrected utilizing a visual inspection.
    - 2. Utilize standard spill cleanup materials and equipment (shovel and absorbents)
    - 3. Any remaining impacted soil will be excavated and properly disposed.
- b. Any contaminated containers will be transferred to a decontamination station for decontamination.

#### **3. Manifesting/documentation: from cleanup area to staging & routing to disposal site**

- a. WM Rep receives call from Trash/Waste collection area and "starts" a new log entry on "Full Container Log" in the WM SharePoint server.
- b. WM Rep asks caller for information, and logs the following for each new order: :
  - i. Date and time request came in
  - ii. Last name of WM Rep taking order
  - iii. Company name of requester
  - iv. Name and BP badge number (if applicable) of contactor requesting service
  - v. Phone number of requester
  - vi. Name of beach/location (efforts will be made to use geographic coordinates when possible)
  - vii. Applicable Staging Area
  - viii. Container ID number (identification of the container)
  - ix. 3<sup>rd</sup> party or WM-owned container

- x. If 3<sup>rd</sup> party container, company name and address of where box needs to be returned
- xi. Service requested – either pick up full only and do not replace with an empty (i.e. "DNR" pulldown), or swap (i.e., "Swap" pulldown).
- xii. Description of waste

NOTE: The description of the waste is required to determine the type of equipment for the job.

- c. Once ALL of these REQUIRED fields are populated, the WM Rep will select "OK" in Share Point, and a "Shipment ID number" will be automatically assigned.
- d. WM - Command Center Rep will provide the caller with that Shipment ID number (sequence of order) for future reference.
- e. Based on information above, WM Rep populates the following four fields:
  - i. Waste Management Method
  - ii. Disposal Facility
  - iii. Whether Disposal Facility is WM or 3<sup>rd</sup> Party
  - iv. Profile number
- f. Staging Area Manager (SAM) / Staging Area Administrator (SAA) reviews WM SharePoint data records for any new orders.
  - i. SAM locates the "Shipment ID Number" on the Full Container Log, and selects driver to perform service.
  - ii. SAA populates the record as follows:
    - a. Shuttle Carrier company name for Service Requested
    - b. Date/time shuttle left Staging Area for Service Requested
    - c. SAM/SAA prints full container log entry as haul ticket
- g. Shuttle truck goes to beach/location to drop off empty container (if a swap) and/or pick up full container (making sure to verify the container number before picking it up). If full box cannot be located, driver will refer to the Routing Slip for the requester's name and phone number to obtain further directions.

The driver will inspect the area prior to removing the container for any environmental impact. If any impact is noted the driver will notify the WM command center to report.

- h. When the driver arrives with a full container at the Staging Area:
  - i. SAA locates the container number on Shipment Log, and pulls up associated Shipment Record.
  - ii. SAA enters the date/time that the full container arrived at the Staging Area in Shipment (full container) Log
    - 1. If the Log shows that this is a 3<sup>rd</sup> party container:
      - a. SAM must verify that contents of the bin matches the log "waste description".
      - b. SAM contacts WM Rep (WM – BP Command Center) to obtain approval to move the 3<sup>rd</sup> party-owned container (*Note, these 3<sup>rd</sup> party containers will be moved by same WM driver, after being dumped, to the 3<sup>rd</sup>-party laydown yard address that BP Command Center populated on log.*)
      - c. WM service representative will email BP Environmental Waste Rep at the BP command center for approval



and report back to SAM when approval has been received to move the container.

- d. Once BP Command Center calls back to say BP has approved pickup, SAA pulls down "yes" in "Was movement of 3<sup>rd</sup> Party Container approved by BP" field.
- iii. SAM obtains a driver to pull full container to disposal facility.
- iv. SAA selects a new pre-printed manifest and enters the following (or makes certain that all of the following information is already contained on it):
  1. Shipment ID number
  2. Staging Area and Beach/Location Information
  3. Management Method
  4. Profile number
  5. Disposal Facility
  6. Unique Manifest number (should be pre-printed)
  7. Size of Container (in CY)
  8. Container ID number
  9. Generator signature (BP or ERM [environmental consultant authorized to sign manifest on behalf of BP] representative, located at each staging area, will sign)
  10. Carrier company name
  11. Driver name
  12. Truck Identifier (Truck Number)
  13. Whether it is a 3<sup>rd</sup> party-owned container.
  14. Address of where to return 3<sup>rd</sup> party (empty) container (after dumping)
  15. Time of departure to disposal facility
- v. SAM/SAA gives driver the completed manifest; driver signs and dates it (as "transporter").
- vi. SAM/SAA prints full container log entry as haul ticket
- vii. BP or ERM representative will sign manifest at the staging area and hand back to driver.
- viii. SAA keeps blue (signed by ERM and Driver) copy. This copy will be mailed to National Accounts Sales and Services (NASS) Program Manager for BP).
- ix. ERM retains gold copy of the manifest for recordkeeping.
- x. Driver departs for disposal facility with load and completed/signed manifest.
- xi. SAA completes the Shipment Line item in data record for this container with the following information (found on their copy of manifest):
  1. SAM's last name
  2. Manifest number
  3. Size of container (CY)
  4. Carrier company name
  5. Driver's last name
  6. Truck Identifier (Truck number)
  7. Date/Time truck left to deliver waste to disposal facility
  8. Load was rejected at Landfill and Returned to Staging Area – pull-down "No"

- xii. If load IS subsequently rejected at landfill and returns to Staging Area for any reason (e.g. incorrect Profile, arrived after operating hours, or

comes up hazardous), SAA will change "No" dropdown to "Yes" dropdown for data field "Load was rejected at Landfill and Returned to Staging Area", and an explanation inserted into "Comments" field (last field in the Record). Then, for these loads:

1. If load will still be going to landfill (e.g., next day when gate opens again), SAA will modify information populated in item ix. for that same Shipment ID when load departs for landfill again.
  2. If re-routing to alternate disposal facility is necessary, SAA will enter "NA" in all of the subsequent fields up to the "Order Closed" field, and pull down "yes". At that point, SAM notifies Command Center to begin new order in "Full Container Log".
- xiii. WM submits the "Daily Shipment Log" electronically to ERM, ERM submits to BP on a daily basis.
- xiv. The Situation Unit completes form ICS-209 from the data presented by ERM

i. Disposal Site Steps:

- i. Driver arrives with load
- ii. Destruction/Disposal Facility Receiver signs and dates manifest (as "facility")
- iii. Load is weighed and info loaded into FastLane (for WM facilities).
- iv. Destruction/Disposal Facility will generate copy of weight ticket and signed manifest (and any other paperwork which denotes any additional services required, such as solidification, etc.) and forwards to WM Command Center.
- v. All manifests and other documentation will be sent to BP electronically and/or mailed to the address identified on the manifest.

4. Site storage restrictions: no storage at staging/routing sites or cleanup sites

- a. No containers loaded with crude oil contaminated debris will be stored at any location other than the BP-approved WM staging site.
- b. Containers loaded with crude oil contaminated debris will not be stored at any BP-approved WM staging site longer than 72 hours for any loads having an approved and signed profile on file.
- c. Each operational BP-approved WM staging site will have 24-hour manned security.



## **Appendix B**

### **Waste Management Operations Plan – Liquids**

As part of the liquids management plan, there are several potential waste streams likely to be encountered:

- A. Crude oil and water from near shore and deep water skimming operations
- B. Used oil and water from vessel maintenance
- C. Bilge water from vessel maintenance
- D. Decontamination water and storm water

#### **Crude Oil and Water Operations**

Crude oil and water may be generated by Operations personnel using several different techniques as part of MC 252 Spill Recovery Operations. Once collected, this material will be managed through one of the following methods:

1. Temporary transfer from vacuum trucks to frac tanks at beachfront operations Staging Areas. Once collected in frac tanks, approved and permitted transporters will collect materials from the frac tanks and transport to BP-approved liquids management facilities
2. Direct transfer from barges and other vessels to BP-approved liquids management facilities
3. Direct Transfer from barges and other vessels to mobile treatment oil water separation equipment for mobile treatment

#### **Used Oil and Water From Vessel Maintenance**

Used oil and water generated from routine vessel maintenance will be collected by vessels deployed in MC 252 operations. Containerized liquids will be held on board vessels until docking arrangements have been made. Once collected, this material will be managed through one of the following methods:

1. Direct Transfer of containers to permitted container transport collection vehicles for transportation to BP-approved liquids management facilities
2. Containers may be pumped out by vacuum trucks and transported directly to BP-approved liquids management facilities

#### **Bilge Water from Vessels**

Bilge Water from vessels may be generated from normal operations of vessels deployed in MC 252 operations. Once collected, this material will be managed through one of the following methods:

1. Direct transfer from vessels using vacuum trucks that will either directly transport to BP-approved liquids management facilities, or temporary transfer to frac tanks while accumulating enough volume to transport to approved liquids management facilities

#### **Decontamination Water and Storm Water**

Decontamination water and storm water will be collected from several equipment, personnel, boom and vessel decontamination stations used in MC 252 operations. Decontamination

personnel will collect decontamination liquids that cannot be recycled or treated through onsite decontamination treatment systems (as referenced in the Decontamination Plan) in Frac tanks. Once collected, this material will be managed using the following method:

Direct transfer from frac tanks to vacuum trucks and transported directly to BP-approved liquids management facilities

#### Liquids Transportation

Liquids generated as part of the spill cleanup response to the MC 252 incident are expected to be transported using one of three methods:

1. In Vacuum trucks that are permitted and approved
2. In containers using permitted and approved van trucks
3. In vessels and frac tanks on barges that are permitted and approved

All transport vehicles and vessels will be required to obtain shipping papers (manifests) that have been signed by appropriate BP personnel or those people authorized by BP to sign on their behalf. For liquids generated on the water (not on land), the manifest process will begin when the material is transferred to a vacuum truck or transferred directly to a BP-approved liquids management facility. For smaller containers, the manifest process will begin when the material is transferred the BP-approved van truck.

Manifests for liquids collected from locations other than WM-operated Staging Areas or Boom, Vehicle, and Equipment Decontamination Stations will be executed by an ERM representative authorized to act as BP's Agent for that function.

#### Liquid Transfer Operations

High volumes of liquids are expected as part of the spill cleanup activities related to the MC 252 event. It is further expected that there will be a high volume of operations that require transfer of collected liquids to either liquids management facilities, frac tanks, and vacuum trucks. Extreme care will need to be exercised during transfer operations of liquids. Operators of vacuum equipment and liquids management facilities will be responsible for ensuring that equipment being deployed has been tested and is in good working order prior to deployment (ie. hoses, fittings, camlocks, etc). Connections to temporary holding tanks and to liquids management facilities should be visually inspected before, during, and after all liquid transfers. Further care should be taken when disconnecting hoses used in liquid transfer to ensure that any free liquids remaining in transfer lines are collected or contained.

#### Temporary Holding Tank Inspections and Containment (Frac Tanks)

Each frac tank that is deployed for use as a temporary holding container for MC 252 spill cleanup operations will have temporary containment berms erected while the tanks are in use or contain liquids. Temporary berms are made of synthetic material and rubber and should be inspected prior to use for visual defects and holes that may allow for leakage. If temporary berms appear to be in poor condition or have holes they will be replaced as soon and practicably possible to avert any potential liquids coming in contact with soils, asphalt, concrete, etc. In addition to temporary berming, each frac tank in use should be inspected prior to any liquids being transferred to ensure that camlock fitting connections and port holes are in good

condition, tightened and not leaking. If frac tanks are in poor condition, they will be removed from service as soon as possible and not re-deployed until repairs have been made.

#### Manifesting of Liquid Materials

Any and all liquids being transported will be required to utilize shipping papers that meet the requirements of all local, state and federal guidelines for transporting liquid wastes. Each manifest will contain information that properly identifies the liquid material being transported, the location from which the material was collected, the liquids management destination facility address, signatures of the shipper and transporter, and the quantity of the material being transported. In addition, liquids management facilities may also require use of liquid waste approval numbers for each shipment of liquid material being received. For liquid materials that are generated from off-shore skimming and recovery operations, the Port of Entry/Dock facility will serve as the address for where the liquid materials were collected.



**Appendix C**  
**Solid and Liquids Disposal Outlets**

**Landfill Sites**

<b>Location Name</b>	<b>Address</b>
Pecan Grove WM	9685 Firetower Road, Pass Christian, MS 39571
Chemical Waste Management – Emelle	36964 Hwy 17 North, Emelle AL
Chemical Waste Management - Lake Charles	7170 John Brannon Road, Sulphur LA 70665
Chastang LF	17045 Highway 43, Mount Vernon AL 36560
Springhill Reigional	4945 Hwy 273, Campbellton FL 32426
*Others TBD as needed	

**Liquids Management Sites**

<b>Location Name</b>	<b>Address</b>
Aaron Oil	11 North Water St., Mobile Alabama 36602
Apex Environmental Services L.L.C.	7455 Rangeline Road, Theodore, AL (Permit IU-41-49-00429)
FCC Environmental	14890 Intercoastal Drive, New Orleans LA 70129
Hepaco	2275 Tucker Industrial Road, Tucker, GA 30084 (Permit DK00161)
Holcim (US) Inc.	3051 Hamilton Blvd, Theodore, AL 36582 (ALD980219588)
Industrial Water Services / Liquid Environmental Solution (IWS/LES)	1980 Avenue "A", Mobile, AL 36615
Newpark Industrial Disposal	26400 Wilber Road, Winnie, TX 77665
ORC (Oil Recovery Services)	1101 South Conception St., Mobile, Alabama 36603
CHES Mobile Treatment Unit	Claudia Lane, Port of Theodore, Theodore AL
*Others TBD as needed	



**Appendix D**  
**List of Staging Areas**

**BP Managed Areas**

<b>Location Name</b>	<b>Address</b>
Panama City	1617 Moylan Dr, Panama City Beach, FL 32407
Bayou Chico	700 Myrick Street, Pensacola, FL
NAS Pensacola - (Transitioning Staging to Bayou Chico)	Blue Angel Pwky (Dock), Pensacola Naval Air Station, FL
City Marina Battery Park Boat Landing	Intersection of A Avenue and Water Street
Port St. Joe	1624 Grouper, Port St. Joe, FL 32456
Allen's Dockside Marina	292 Graham Drive, Carrabelle, FL 32322
Tallahassee DC	4755 Capital Circle NW, Tallahassee, FL (Capital Circle Commerce Park)
Spud Barge	Will be physically located on the water near Allen's Dockside Marina
Panama City Marina	1 Harrison Avenue, Panama City, FL
USCG Station Destin	200 Miracle Strip Pwky. Destin, FL 32540
Perdido Pass at Orange Beach (Old Outcast Marina)	27555 Larry C Kerry Lane, Orange Beach, AL
Fort Morgan (Gulf Shores Marina)	1577 Highway 180, Gulf Shores, AL 36542
Mobile DC	2455 Michigan Ave, Mobile, AL 36615
Mobile IC	1087 Downtowner Blvd, Mobile, AL
Theodore Industrial Park (Patriot)	2460 Claudia Lane, Theodore, AL 36582
Dauphin Island - STAGING	1115 to 1127 Desoto Ave, Dauphin Island, AL 36528
Dauphin Island - COMMAND	421 Albright Drive, Dauphin Island, AL 36528
Bayou La Batre	14805 State Docks Rd, Bayou La Batre, AL
Pascagoula	2210 Petit Bois, Pascagoula, MS 39581
Point Clear Boat Ramp	3134 Graveline Road, Gautier, MS 39553
Point Cadete Marina (Tied to Biloxi Small Craft Harbor)	119 Beach Blvd, Biloxi, MS 39533
Biloxi DECON	108 8th Street, Biloxi, MS
Biloxi Small Craft Harbor (Tied to Point Cadete)	679 Beach Blvd, Biloxi, MS 39530
Biloxi DC	13032 Hwy 67 N, Biloxi, MS 39532
Biloxi IC	13061 Hwy 67 N, Biloxi, MS 39532
Gulfport Boat Ramp - public	3215 West Beach Blvd, Gulfport, MS
Pass Christian Harbor	106 Market Street, Pass Christian, MS.
Bay St. Louis (Bayou Caddiy)	5200 Shipyard Road, Bay St. Louis, MS 39520
Stennis Airport	7250 Stennis Airport Road, Kiln, MS 39556
*Others TBD as needed	

**WM Managed Areas**

<b>Location Name</b>	<b>Address</b>
Pecan Grove Staging Area- WM	9685 Firetower Road, Pass Christian, MS 39571
Biloxi Staging Area (Tentative location) - WM	Biloxi, MS 39532
Pascagoula Staging Area - WM	2210 Petit Bois Avenue, Pascagoula, MS 39581
Theodore Staging Area - WM	4770 Hamilton Blvd., Theodore, AL 36582
Foley Staging Area - WM	18110 Eureka Drive, Foley, AL 36535
Pensacola Staging Area - WM	2023 Longleaf Drive, Pensacola, FL 32505
Myrick Staging Area (formerly @ PNAS) - WM	700 Myrick Street, Pensacola, FL
Panama City Staging Area - WM	4217 Cato Road, Panama City Beach, FL 32404
Theodore Dock	Claudia Lane, Port of Theodore, Theodore AL
*Others TBD as needed	

**ERM Managed Areas**

<b>Location Name</b>	<b>Address</b>
Bayou Chico	700 Myrick Street, Pensacola, FL
Biloxi	108 8th Street, Biloxi, MS
Theodore Industrial Park	2460 Claudia Lane, Theodore, AL 36582
*Others TBD as needed	

## ICS Form 209 Final Waste Status Summary

ICS 209 - Incident Status Summary (Oil Spill)									
Incident:					Prepared By: _____ at _____				
Period:					Version Name:				
Spill Status (Estimated, BBLs)					Equipment Resources				
Source Status:		Remaining potential:			Type	Ordered	Available / Staged	Assigned	Out-Of-Service
<input type="radio"/> Secured <input type="radio"/> Unsecured		Rate of spillage:							
		Last 24 Hours		Total					
Mass Balance/Oil Budget									
Total spilled product accounted for: _____									
Waste Management (Estimated, BBLs)									
Type	Recovered	Stored	Disposed of						
Oil									
Oily Liquid									
Liquid									
Oily Solid									
Solid									
Shoreline Impacts					Personnel Resources				
Degree of Oiling	Miles Affected	Miles Cleaned	Miles Remaining to be Cleaned		Organization	People in the Field	People in Cmd. Post	Total People On Scene	
Light					Federal				
Medium					State				
Heavy					RP				
Total									
Wildlife Impacts									
Type	Captured	Cleaned	Released	DOA	Died in Facility				
Bird									
Mammal									
Reptile									
Fish									
Other									
Total									
Safety Status					Comments				
Type	Last 24 Hours		Total						
Responder Injury									
Public Injury									
Other									
ICS 209 - Incident Status Summary (Oil Spill)									
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## **Appendix F Transportation Plan**

### **1. INTRODUCTION**

As part of the response to the Deepwater Horizon incident originating in Mississippi Canyon Block 252 (MC 252) of the Gulf of Mexico, oil spill cleanup activities are being performed that will result in waste generation and subsequent transportation requirements related to these activities. Anticipated wastes requiring transportation include liquids from oil skimming activities and liquid decontamination activity waste, and solids from shoreline remediation (e.g. oily debris, damaged booms, absorbents).

This Transportation Plan has been prepared to address the waste transport related materials that will be generated as part of the Waste Management Plan (WMP). All transportation and disposal activities will be performed in accordance with all applicable federal, state, local laws, regulations, and ordinances. Additional operating standard guidelines vehicle operations related to pre-trip, in-route transportation and post trip activity can found in Waste Management (WM) Standard Operating Guidelines for Fleet & Transportation, (available on request from WM).

### **2. WASTE STAGING ACTIVITIES**

Strategic staging areas have been identified to support the cleanup operations associated with this incident. The areas are divided by function of the site which includes equipment staging sites and decontamination stations. A third classification of staging site are beach locations but are not listed since those locations will be determined as needed. Also BP and WM reserve the right to add additional staging areas, as needed. A list of the staging locations are provided in Appendix D.

### **3. TRUCK LOADING OPERATIONS**

Trucks will be loaded in designated portion of the staging area as directed by the Staging Area Manager (SAM). Prior to loading of either liquids or solids, the driver will perform a circle check of the equipment to assure that the container is properly placarded, that no contamination is on the outside of the vessel, that valves are secure for liquid transport and appropriate tarps are available if required. In most instances, the solids will be transported in roll-off type containers. Drivers should be aware of the potential for free liquids and appropriate actions should be taken to ensure compliance with receiving facilities' requirements.

### **4. WASTE PROFILE**

All waste that has been generated from activities related to MC252 operations will require proper classification and profiling into BP-approved, designated facilities prior to shipment so as to avoid delay during offloading procedures. WM will work to secure waste material profiles that are generic in nature so that logistical operations will not be impeded. Trucks for both liquids and solids should not be dispatched unless approved profiles are in place for the proposed destination facility.

### **5. SHIPMENT DOCUMENTATION**

Waste from spill activity will be profiled as non-hazardous waste, a proper shipping document (non-hazardous manifest) will be provided to the hauler that will be used to document and accompany each truck shipment. At a minimum, the shipping document will include the following information:

- Name and Address of Waste Generation staging area
- Name and Address of Waste Transporter
- Name and Address of Disposal Facility
- Description of the Waste
- Quantity of Waste Shipped

A copy of the shipping document for each truckload on-site at the Staging Area until the removal action is complete. All records will be returned to BP at the conclusion of the project.

## **6. REQUIREMENTS OF TRANSPORTERS**

WM will provide company drivers or hire qualified transporters to haul the waste materials to the appropriate staging area and disposal facility. The selected transporters will be fully licensed and insured to transport the waste material.

## **7. TRAFFIC CONTROL PROCEDURES**

Solids for disposal will be transported in covered roll-off bins or appropriate end dump trailers to the designated disposal facility. As much as possible, trucks will be staged on-site to avoid impacts on the local streets. Bulk liquids will be transported in appropriate vehicles to maximize volume and minimize local truck traffic. WM will work to adhere to local conditions and restrictions as required by local ordinance.

While at staging areas, vehicles will be required to maintain slow speeds (i.e., less than five miles per hour) for safety purposes and for dust control.

## **8. TRANSPORTATION ROUTES**

Transportation of waste materials will be on arterial streets and/or freeways, approved for truck traffic, to minimize any potential impact on the local neighborhood and community. WM will work with local officials to identify the routes vehicles will take so as to minimize impact to local communities and activities.

## **9. OFF-SITE LAND DISPOSAL FACILITIES**

Based the waste disposal needs, predetermined waste profile have been established at facilities that are expected to receive waste from activities related to MC252 activities. Final determination of the selected disposal facility will be based on waste type (solids or liquids) and availability for processing or disposal. Attachment C, lists approved disposal facilities and will be updated as required, and as directed by BP.

## **10. RECORDKEEPING**

ERM will be responsible for maintaining a field logbook at each Staging Area during the removal action activities. The field logbook will serve to document observations, personnel on-site, truck arrival and departure times, and other vital project information.

## **11. HEALTH AND SAFETY**

Drivers and support personnel will adhere to the site-specific health and safety plan (HASP) that has been prepared for staging areas, collection points or disposal facilities. All personnel working at these sites will be required to be familiar with the HASP.

## **12. CONTINGENCY PLAN**

Each waste hauler is required to have a contingency plan prepared for emergency situations (vehicle breakdown, accident, waste spill, waste leak, fire, explosion, etc.) during transportation of waste material from the Site or designated staging areas to the designated disposal facility. Once the waste hauler is selected, a copy of its contingency plan will be kept on file. An emergency telephone number will be provided to all drivers.



**Appendix G**  
**Example Non-Hazardous Manifest**

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Please print or type.

<b>NON HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. <b>WM - 55340</b>		
5. Generator's Name and Mailing Address		Generator's Site Address (If different than mailing address)					
Generator's Phone:							
6. Transporter 1 Company Name					U.S. EPA ID Number		
7. Transporter 2 Company Name					U.S. EPA ID Number		
8. Designated Facility Name and Site Address					U.S. EPA ID Number		
Facility's Phone:							
9a. HM	9b. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No. Type		11. Total Quantity	12. Unit Wt./Vol.	13. Waste No.	
1.							
2.							
3.							
4.							
14. Special Handling Instructions and Additional Information							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable and national governmental regulations and is (are) not a hazardous waste as defined by 40 CFR Part 261 or any applicable state law.							
Generator's/Offeror's Printed/Typed Name		Signature			Month	Day Year	
Transporter Acknowledgement of Receipt of Materials							
16. Transporter 1 Printed/Typed Name		Signature			Month	Day Year	
17. Transporter 2 Printed/Typed Name		Signature			Month	Day Year	
18. Discrepancy Comments							
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection							
Manifest Reference Number:							
19. Management Method Codes							
1.	2.	3.	4.				
20. Designated Facility Owner or Operator: Certification of receipt of materials covered by the manifest except as noted in Item 18a							
Printed/Typed Name		Signature			Month	Day Year	

**Appendix H**  
**Waste Manifest Signature Delegation Authority**

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DRAFT



**Environmental  
Resources  
Management**

15810 Park Ten Place  
Suite 300  
Houston, Texas 77084-  
5140  
(281) 600-1000  
(281) 600-1001 (fax)

May 11, 2010

Mr. David Sweeten  
BP America Production Company  
501 Westlake Park Boulevard, 20.106B  
Houston, Texas 77079

Project No. 0115942

**Subject:** Appointment of Agent

Dear Mr. Sweeten:

This letter sets forth our understanding with respect to the execution by Environmental Resources Management ("ERM"), as agent for, and on behalf of BP America Inc. and its affiliates ("Client"), of bills of lading, profiles, manifest documents or related documents relating to transportation and disposal of materials subject to government regulation, including, without limitation, waste and hazardous waste ("Materials") to be removed from sites related to response activities for the Mississippi Canyon Block 252 incident in Alabama, Florida and Mississippi (the "Sites").

As Materials are removed from the Sites, ERM understands that Client will not always have an authorized representative present to execute the documents referred to above. Accordingly, upon execution by Client of this letter, ERM will assist Client in this undertaking by executing such Documents as Client's agent, through ERM's individual on-site representatives. Client will select transportation and disposal vendors. ERM will not be a party to any contracts for transportation or disposition of Materials. Under no circumstances shall ERM be deemed to be the generator of, or to have manifested or arranged for the transportation or disposal of, any Materials.

By executing this letter, Client, as principal, authorizes and appoints ERM as its agent for the sole purpose of executing, as Client's agent, bills of lading, profiles, manifest documents or related documents relating to transportation and disposal of Materials to be removed from the Sites and agrees to indemnify, defend and hold harmless ERM and its officers, directors and employees from any actual or alleged liability, loss, damage, fine, penalty, cost or expense (including reasonable attorney fees) arising out of or connected with any acts undertaken by ERM and its above designated employees within the scope of the agency granted herein by Client to ERM, including, without limitation, any liability derived from any so-called state or federal "Superfund" law.



May 10, 2010  
Mr. David Sweeten  
Page 2

Please indicate your acceptance of the foregoing by signing and returning to me the enclosed copy of this letter. Upon your acceptance, this letter shall constitute a binding contract between the parties with no further consideration other than the mutual promises herein contained.

Very truly yours,

Agreed and Accepted:

Environmental Resources Management

BP America Production Company

By: 

By: 

Title: Assistant Secretary

Principal

Date: May 11, 2010

MWA/jan